



Advocates for Workplace Fairness

September 12, 2019

**Via CM/ECF**

The Honorable Robert W. Lehrburger  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Chen-Oster, et al. v. Goldman, Sachs & Co.*, No. 10 Civ. 6950 (AT) (RWL)


Dear Judge Lehrburger:

Pursuant to Your Honor's Individual Rule of Practice III.G.2, the parties have met and conferred regarding the exhibit filed under seal in support of Goldman's letter regarding named plaintiff discovery (ECF No. 832-5) and the narrow redactions in Plaintiffs' response and Goldman's reply (ECF Nos. 837, 839). This exhibit and the parties' redactions contain Plaintiff Gamba's private, sensitive financial information and are confidential. Specifically, Goldman's exhibit contains Ms. Gamba's private tax filings for 2017 and 2018 relating to her interior design firm, and the parties' redactions are limited to the amount of compensation Ms. Gamba received for occasional design projects in 2015 and 2016. Sealing of such information is consistent with this District's ECF Privacy Policy, which requires redaction of financial account numbers and further requires parties to "exercise caution when filing documents that contain . . . individual financial information." *See also* Individual Rule of Practice III.G.1 (parties must comply with SDNY ECF Privacy Policy).

Plaintiffs therefore respectfully request that the Court permit Ms. Gamba's tax filings to remain under seal and the amount of her personal compensation to remain redacted. Goldman does not oppose this request.

Thank you for your continued attention to this matter.

Respectfully submitted,



Kelly M. Dermody



Adam T. Klein